



COOPER TIRE & RUBBER COMPANY

LIMA & WESTERN AVENUES
FINDLAY, OHIO 43040

RICHARD D. TEEPLE
VICE PRESIDENT
GENERAL COUNSEL

February 19, 1999

(419) 424-4318
Telecopy: (419) 424-7320

CERTIFIED MAIL RETURN RECEIPT REQUESTED (F 966 629 900)

Associate Administrator for Enforcement
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
400 7th Street, S.W.
Washington, D.C. 20590

94T-004 (01)

Gentlemen:

Cooper Tire & Rubber Company has determined a defect which relates to motor vehicle safety exists in a limited number of tires as set forth in the attached Defect and Noncompliance Report dated February 16, 1999.

These tires are being voluntarily recalled.

A copy of this letter, with attachments, is being faxed to the Office of Defects Investigation (ODI) for review by ODI of the proposed owner notification letters pursuant to 49 CFR Section 573.5(c)(10). Some of the tires involved in the subject recall may have been shipped to Puerto Rico. Therefore, in accordance with 49 CFR 577.5(a), included as Exhibit III to the Defect and Noncompliance Information Report is a copy of the Owner Notification Letter in Spanish and English. Also included in Exhibit III is a copy of the Dealer letter in Spanish as well as English. We are asking ODI to approve the sample owner letters. Hard copy will follow. Unless advised otherwise by ODI, owner notification will begin March 1, 1999. Three copies of the appropriate notification to dealers and customers are attached as exhibits in response to Item 9 of the Defect and Noncompliance Information Report.

Our envelope format for owner recall notification letters as required under 49 CFR 577.5(a) has been previously approved by ODI. See the attached. While not required by the regulations, on the envelope in which any owner notification letters are sent to Puerto Rico, we will also type above the English "SAFETY RECALL NOTICE" the Spanish translation thereof which is: "AVISO DE RETIRO POR RAZONES DE SEGURIDAD".

Cooper will provide the required quarterly report on the status of the above-mentioned campaign.

Please advise Richard D. Teeple of the NHTSA assigned campaign number.

Very truly yours,

Richard D. Teeple

RDT/ppp/#8027
Attachments

CERTIFIED MAIL RETURN RECEIPT REQUESTED (P 966 629 900)

Associate Administrator for Enforcement

NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION

February 19, 1999

Page 2

UNT-004 (02)

cc: Office of Defects Investigation "NSA-10"
Department of Transportation
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
400 7th Street, S.W.
Washington, D.C. 20590
Fax Number 202/366-7882
Attn: Mr. Jon White, Chief
Technical Analysis Branch



U.S. Department
of Transportation
National Highway
Traffic Safety
Administration

RECEIVED

SEP 25 1995

LEGAL DEPARTMENT

SEP 21 1995

400 Seventh Street, S.W.
Washington, D.C. 20590

997-004 (03)

Mr. Scott R. Pinzone, Esq.
Associate Counsel
Cooper Tire & Rubber Company
Lima & Western Avenues
Findlay, OH 45840

NSA-111paw


Dear Mr. Pinzone:

This acknowledges receipt of your letter dated August 2, 1995, submitting for approval a sample envelope format for owner recall notification letters as required under Section 577.5(a).

Section 577.5(a) requires the marking of envelopes in which recall notification letters are sent. These envelopes shall bear, in all capital letters, the words "SAFETY," "RECALL," and "NOTICE," in any order. The format you have proposed meets the requirements under this section.

If you have any questions concerning this matter, please contact Mr. Jon White or Mrs. Pat Wallace at (202) 366-5227.

Sincerely,


Jonathan D. White, Chief
Technical Analysis Branch
Office of Defects Investigation
Safety Assurance



AUTO SAFETY HOTLINE
(800) 424-9393

COOPER TIRE & RUBBER COMPANY
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

DATE: 2/16/98

NHTSA CAMPAIGN NO.

COOPER NO. 106

I. NAME OF MANUFACTURER**A. Fabricating Manufacturer:** Cooper Tire & Rubber Company**B. Brand Name or Trademark Owner:****BRAND NAME****OWNER**

See Attachments 1A - 1B

POTENTIAL NUMBER OF AFFECTED TIRES (Including a description of the basis for the determination of the recall population and a description of how these items differ from similar items not included in the recall):

<u>Description</u> <u>(including size)</u>	<u>Inclusive Dates</u> <u>(week and year)</u> <u>of Manufacture</u>	<u>Number of</u> <u>Potentially</u> <u>Affected Units</u>	<u>Estimated Percent</u> <u>Containing Defect</u> <u>or Noncompliance</u>
See Attachments 1A - 1B		216	58.3 %

The recall population was determined by a review of our Tire Building and Curing Department production records and our internal tire inspection results. The tires being recalled differ from similar items in that they were molded with a different DOT serial week and year (468 - 488) in accordance with 49 CFR 574.5.

- 3. TOTAL UNITS POTENTIALLY AFFECTED:** 216
- 4. TOTAL ESTIMATED PERCENT CONTAINING DEFECT:** 58.3%

COOPER TIRE & RUBBER COMPANY
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

5. **DESCRIPTION OF DEFECT OR NONCOMPLIANCE** (Including brief summary and detailed description, with graphic aids as necessary, of nature and physical location of the defect or noncompliance):

The subject tires were produced between the dates of November 18, 1998 and December 1, 1998 and may not have adequate rubber coverage of the belt edge due to low tread gauge under the shoulder slots. When this condition exists, it may eventually cause cracking at the base of the slot resulting in exposed belt wires which could lead to accelerated belt degradation.

6. **CHRONOLOGY OF ALL PRINCIPLE EVENTS THAT WERE THE BASIS FOR THE EXISTENCE OF A SAFETY RELATED DEFECT** (Including a summary of all warranty claims, field service reports, and other information, with their dates of receipt):

The existence of the condition was determined by cut tire section analysis of tires built between 11/18/98 and 12/1/98. Through production records, we have determined a total gross cure of 3,474 tires were produced. A total of 3,258 tires have been accounted for in our inventory. There are a total of 216 tires which are unaccounted for. Cooper is voluntarily recalling these 216 tires.

7. **COMPLIANCE TESTING OR OTHER DATA THAT WAS THE BASIS FOR DETERMINING THE EXISTENCE OF NONCOMPLIANCE:**

The existence of the anomaly was discovered during cut tire section analysis.

8. **STATEMENT OF MEASURES TO BE TAKEN TO REMEDY THE DEFECT OR NONCOMPLIANCE:**

All tires captured in our distribution system that exhibit this condition have been scrapped. All unaccounted for tires with the affected DOT serial numbers are to be returned to one of our regional inspection points and will be scrapped.

9. **ENCLOSURES, IF ANY** (Three copies of all notices, bulletins and other communications that were sent to more than one distributor, dealer or purchaser and relate directly to the defect or noncompliance):

See Exhibit Index & Exhibits I - IV

COOPER TIRE & RUBBER COMPANY
DEFECT AND NONCOMPLIANCE INFORMATION REPORT
ATTACHMENT 1A

DATE: 2/16/99

NHTSA CAMPAIGN NO.

COOPER NO. 106

1. NAME OF MANUFACTURER

A. Fabricating Manufacturer: Cooper Tire & Rubber Company

B. Brand Name or Trademark Owner:

BRAND NAME
OWNER

COOPER COBRA RADIAL G/T

COOPER TIRE & RUBBER COMPANY

- 2. POTENTIAL NUMBER OF AFFECTED TIRES** (Including a description of the basis for the determination of the recall population and a description of how these items differ from similar items not included in the recall):

<u>Description (including size)</u>	<u>Inclusive Dates (week and year) of Manufacture</u>	<u>Number of Potentially Affected Units</u>	<u>Estimated Percent Containing Defect or Noncompliance</u>
P215/70R14 Tubeless Radial Standard Load			
Cooper Cobra Radial G/T	3DHYC28468 Nov. 15, 1998 thru Nov. 21, 1998	102	29.0%
	3DHYC28478 Nov. 22, 1998 thru Nov. 28, 1998	21	100%
	3DHYC28488 Nov. 29, 1998 thru Dec. 5, 1998	25	45.8%

- 3. TOTAL UNITS POTENTIALLY AFFECTED:** 148

- 4. TOTAL ESTIMATED PERCENT CONTAINING DEFECT:** 56.8%

COOPER TIRE & RUBBER COMPANY
DEFECT AND NONCOMPLIANCE INFORMATION REPORT
ATTACHMENT 1B

DATE: 2/16/99

NHTSA CAMPAIGN NO.

COOPER NO. 106

1. NAME OF MANUFACTURER

A. Fabricating Manufacturer: Cooper Tire & Rubber Company

B. Brand Name or Trademark Owner:

BRAND NAME**OWNER**

VIPER RADIAL GT

SEARS ROEBUCK & COMPANY

2. POTENTIAL NUMBER OF AFFECTED TIRES (Including a description of the basis for the determination of the recall population and a description of how these items differ from similar items not included in the recall):

<u>Description (including size)</u>	<u>Inclusive Dates (week and year) of Manufacture</u>	<u>Number of Potentially Affected Units</u>	<u>Estimated Percent Containing Defect or Noncompliance</u>
P215/70R14 Tubeless Radial Standard Load			
Viper Radial GT	3DHYUDN468 Nov. 15, 1998 thru Nov. 21, 1998	38	24.6%
	3DHYUDN478 Nov. 22, 1998 thru Nov. 28, 1998	30	99.8%

3. TOTAL UNITS POTENTIALLY AFFECTED: 68

4. TOTAL ESTIMATED PERCENT CONTAINING DEFECT: 62.4%

COOPER RADIAL PASSENGER TIRE RECALL CAMPAIGN

- EXHIBIT I NOTIFICATION TO COOPER DEALERS CONSISTING OF COOPER DEALER LETTER, COOPER CONSUMER LETTER AND FORMS (SEE EXHIBIT IV FOR FORMS).
- EXHIBIT II NOTIFICATION TO SEARS ROEBUCK & COMPANY CONSISTING OF SUGGESTED DEALER LETTER, SUGGESTED CONSUMER LETTER AND FORMS (SEE EXHIBIT IV FOR FORMS).
- EXHIBIT III NOTIFICATION TO COOPER PUERTO RICO DEALERS CONSISTING OF COOPER PUERTO RICO DEALER LETTER, COOPER PUERTO RICO CONSUMER LETTER AND FORMS (SEE EXHIBIT IV FOR FORMS).
- EXHIBIT IV FORMS AS INCLUDED IN NOTIFICATIONS ABOVE WHERE NOTED.



987-004 (05)

THE COOPER TIRE COMPANY

A DIVISION OF COOPER TIRE & RUBBER COMPANY

701 LIMA AVENUE
FINDLAY, OHIO 45840-2316
TELEPHONE: (419) 423-1321

March 2, 1999

Dear Dealer:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Cooper Tire & Rubber Company has determined that a defect which relates to motor vehicle safety exists in some tires identified as follows:

P215/70R14 Cobra Radial G/T 148 Tires

Identification numbers: 3DHYC28468
3DHYC28478
3DHYC28488

Our company's surveillance indicates that the tires described above may not have adequate rubber coverage of the belt edge due to low tread gauge under the shoulder slots. Such a condition could result in a separation. If the separation is not detected, continued use may cause the ply cords to break and the tubeless liner to tear and lose the inflating air. Loss of air might result in loss of control with vehicle crash the potential occurrence.

Cooper Tire & Rubber Company is voluntarily recalling all of the tires with the identification number listed. Effective immediately, you or your dealers must not sell any of the tires listed and described above.

You should also comply with the following instructions regarding the return of new and used tires at no charge in accordance with such provisions.

PROCEDURE FOR RETURN AND CREDIT OF RECALLED TIRES

NEW TIRES:

All recalled new tires existing in your inventory, or in your sub-dealers' inventories, should be returned immediately in one shipment, freight collect, to: (address). To assure proper handling, these tires should be listed on the attached Returned Goods Form and the form must accompany this shipment in the packing slip envelope provided. This envelope must be listed on the bill of lading as: "1 envelope - related shipping documents."

Upon verification by Cooper that the tires returned are within the recall group, we will issue credit to you based upon your invoice price of the tires.

CD1060299

USED TIRES:

Cooper Tire's registration records are being searched and consumers who have purchased tires with the subject identification number(s) are being notified of the RECALL. Attached for your information is a copy of the notification being sent to such consumers. Tires removed from consumer vehicles as a result of this RECALL should be replaced with tires of like size and construction bearing identification numbers other than those listed above.

We have advised the consumer to return his recalled tire(s) and his letter to you. If your inspection verifies that the consumer has a tire(s) with the suspect identification number, the tire(s) should be replaced, mounted and balanced at no charge, if presented for remedy within sixty (60) days after (i) receipt of this letter or (ii) notice that a replacement tire(s) is available (if not available at the time of the inspection). It is expected that replacement tire(s) will be available at the time of inspection, however, if the tires are not available at the time of inspection, they will be available within twenty-one (21) days. After expiration of the sixty (60) days, tires will be replaced under our normal adjustment policy.

We have advised the consumer that it will take approximately thirty (30) minutes each to replace the recalled tires. For any tires removed from consumer vehicles during such sixty (60) day period, Cooper Tire will authorize an allowance of \$6.00 per tire to cover mounting and balancing.

Tires removed from consumer vehicles must be listed on our standard Tire and Tube Claim Form. The Claim Form must be properly completed and signed by the consumer. This claim form must accompany the shipment according to standard adjustment procedures.

For the purpose of the RECALL, the Claim Form must include RECALL tires only. The word "RECALL" must be printed directly below the name and address on the claim form. All tires should be identified in crayon with the Claim Form reference number per standard adjustment procedures.

Upon verification by Cooper Tire, credit will be issued to you on a no charge replacement basis if replaced by you and returned to: (address) on or before ninety (90) days after notice of this RECALL.

You should return in one shipment all recalled used tires to the inspection point as indicated on the attached map. These tires should be classified as SCRAP and shipped as SCRAP RUBBER TIRES, freight collect. Freight collect privileges apply only within the prescribed time period. Any tires returned after the designated time will be handled under our regular adjustment procedures.

Cooper Tire requests that you advise it of those customers of yours, if any, who have purchased any of the tires described above for which registration forms have not previously been submitted so that such customers can be advised of the recall and the replacement of their recalled tires can be scheduled.

If you have any questions pertaining to the implementation of this RECALL or need assistance, please contact Cooper Tire Consumer Relations Department (800)854-6288.

Sincerely,



James M. Pruett, Operations Manager
Consumer Relations

JMP:jec

Attachments

CD1060299



99T-004 (12)

THE COOPER TIRE COMPANY

A DIVISION OF COOPER TIRE & RUBBER COMPANY

701 LIMA AVENUE
FINDLAY, OHIO 45840-2316
TELEPHONE: (419) 423-1321**Dear Customer:**

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Cooper Tire & Rubber Company has determined that a defect which relates to motor vehicle safety exists in some tires identified as follows:

P215/70R14 Cobra Radial G/T

Identification numbers: 3DHYC28468
3DHYC28478
3DHYC28488

Our company's surveillance indicates that the tires described above may not have adequate rubber coverage of the belt edge due to low tread gauge under the shoulder slots. Such a condition could result in a separation. If the separation is not detected, continued use may cause the ply cords to break and the tubeless liner to tear and lose the inflating air. Loss of air might result in loss of control with vehicle crash the potential occurrence.

Cooper Tire is voluntarily recalling all of the tires with the identification numbers above. To insure your safety and satisfaction with our product, we request that you return the recalled tires and this letter to your dealer. If the inspection verifies that you have a tire or tires with the suspect identification number, they will be replaced, mounted and balanced at no charge to you if you have presented them for remedy within sixty (60) days after (i) receipt of this letter or (ii) notice that a replacement tire is available (if not available at the time of inspection). It is expected that replacement tires will be available at the time of inspection, however, if the tires are not available at the time of inspection, they will be available within twenty-one (21) days. After expiration of the sixty (60) day period, tires will be replaced under our normal adjustment policy.

The time required to determine if the tire is subject to RECALL is only a few minutes and approximately thirty (30) minutes per tire if replacement is required.

Should any questions or problems arise while your tires are being inspected or replaced, please call Consumer Relations at (800)854-6288. We will attempt to be of service to you. In the event you believe we have failed to or are unable to replace your tire(s) without charge to you, within the

CC1060299

AN EQUAL OPPORTUNITY EMPLOYER

sixty (60) day period described above, you may so notify the Secretary of Transportation at the following address: Administrator, National Highway Traffic Safety Administration, Washington, DC 20590, or phone NHTSA "Hot Line" 800-424-9393 or (202)366-0123 in the Washington, DC area.

We regret this inconvenience, but are sure that you understand our interest in your safety and satisfaction with your tires. Please see your dealer immediately for free replacement of the recalled tires. Give this letter to them so that it can be returned to us for purposes of this recall.

Sincerely,



James M. Pruett, Operations Manager
Consumer Relations

JRP:jec

TO BE COMPLETED BY DEALER

Tires inspected and replaced _____
(date)

Dealer stamp or name and address

Dealer: Please complete the above, attach letter to the tire and tube claim form and return with the recalled tires.

CC1060299



THE COOPER TIRE COMPANY

A DIVISION OF COOPER TIRE & RUBBER COMPANY

FINDLAY, OHIO 45840

THOMAS R. GRIFFITH
VICE PRESIDENT - MARKETING

March X, 1999

(419) 423-1321

997-004 (19)

Mr. Rick Sawyer
Sears DC-245BA
3333 Beverly Road
Hoffman Estates, IL 60179

Dear Mr. Sawyer:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Cooper Tire & Rubber Company has determined that a defect which relates to motor vehicle safety exists in some tires identified as follows:

P215/70R14 Viper Radial G/T

68 Tires

Identification numbers: 3DHYUDN468
3DHYUDN478

Our company's surveillance indicates that the tires described above may not have adequate rubber coverage of the belt edge due to low tread gauge under the shoulder slots. Such a condition could result in a separation. If the separation is not detected, continued use may cause the ply cords to break and the tubeless liner to tear and lose the inflating air. Loss of air might result in loss of control with vehicle crash the potential occurrence.

Attached is a copy of the Defect and Noncompliance Information Report by which Cooper Tire & Rubber Company notified the National Highway Traffic Safety Administration (NHTSA) of its determination of the existence of the safety related defect.

Section 159(1) of the National Traffic and Motor Vehicle Safety Act, as amended, states that the owner of the brand name under which the tire is marketed is deemed to be the manufacturer of such tires. Accordingly, pursuant to 49 CFR Part 573.3(d) you must make a determination of whether a safety defect exists in the above described tires. If you determine that such a defect exists, you must also provide the NHTSA with a defect and noncompliance information report (you may wish to incorporate by reference Cooper's defect and noncompliance information report).

Cooper Tire & Rubber Company is voluntarily recalling all of the tires with the identification number listed. Effective immediately, it is requested that you or your dealers not sell any of the tires described above.

You should also comply with the following instructions regarding the return of new and used tires at no charge in accordance with such provisions:

SH1060299

PROCEDURE FOR RETURN AND CREDIT OF RECALLED TIRESNEW TIRES:

All recalled new tires existing in your inventories and in your dealer's inventories, should be returned immediately in one shipment, freight collect, to the designated inspection point for your area as indicated on the attached map. To assure proper handling, these tires must be listed on the attached Returned Goods Form and the form must accompany this shipment in the packing slip envelope provided. This envelope must be listed on the bill of lading as: "1 envelope - related shipping documents".

Upon verification by Cooper that the tires returned are within the recall group, Cooper will issue credit to you based upon your invoice price of the tires.

USED TIRES:

Sears, Roebuck and Co. registration records should be searched and consumers who have purchased tires with the above identification numbers notified of the RECALL. Tires removed from consumer vehicles as a result of this RECALL should be replaced with tires of like size and construction bearing identification numbers other than those listed above.

All such tires presented to dealers for remedy during the sixty (60) day period beginning on the later of (i) the date on which the owner or purchaser received notice of this recall or (ii) the date on which the owner or purchaser received notice that a replacement tire is available, should be replaced, mounted and balanced at no charge. If replacement tires are not presently in your inventory, they will be furnished to you within twenty-one (21) days after we have been advised that the consumer has presented such tires for replacement. Please notify us immediately of your need for replacement tires following the inspection. After expiration of the sixty (60) day period, tires should be replaced to the consumer under Sears' regular adjustment policy.

You should advise your customers that it will take approximately thirty (30) minutes each to replace the recalled tires. For any tires removed from consumer vehicles during such sixty (60) day period, Cooper will authorize an allowance of \$6.00 per tire to cover mounting and balancing.

Tires removed from consumer vehicles must be listed on your standard Tire and Tube Claim Form. This claim form must be properly completed and signed by the consumer. This claim form must accompany the shipment according to standard adjustment procedures.

For the purpose of the RECALL, the claim form must include RECALL tires only. The word "RECALL" must be printed directly below the name and address on the claim form. All tires should be identified in crayon with the claim form reference number per your standard adjustment procedures.

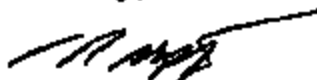
Upon verification by Cooper, credit will be issued to you on a no charge basis if replaced by you and returned to Cooper on or before ninety (90) days after notice of this RECALL.

You should return in one shipment all recalled used tires to the inspection point as indicated on the attached map. These tires should be classified as SCRAP and shipped as SCRAP RUBBER TIRES, freight collect. Freight collect privileges apply only within the prescribed time period. Any tires returned after the designated time will be handled under the regular adjustment procedures.

Cooper requests that you notify those customers of yours who have purchased any of the tires described above so that the replacement of their recalled tires can be scheduled. Attached are suggested copies of the notifications to be sent to your dealers and customers.

If you have any questions pertaining to the implementation of this RECALL or need assistance, please contact our Consumer Relations Department.

Sincerely,



T. R. Griffith

TEG:jc

Attachments

SH1060299

COOPER TIRE & RUBBER COMPANY
DEFECT AND NONCOMPLIANCE INFORMATION REPORT

DATE: 2/16/98

NHTSA CAMPAIGN NO.

COOPER NO. 106

1. NAME OF MANUFACTURER**A. Fabricating Manufacturer:** Cooper Tire & Rubber Company**B. Brand Name or Trademark Owner:****BRAND NAME****OWNER**

See Attachments 1A - 1B

POTENTIAL NUMBER OF AFFECTED TIRES (including a description of the basis for the determination of the recall population and a description of how these items differ from similar items not included in the recall):

<u>Description</u> <u>(including size)</u>	<u>Inclusive Dates</u> <u>(week and year)</u> <u>of Manufacture</u>	<u>Number of</u> <u>Potentially</u> <u>Affected Units</u>	<u>Estimated Percent</u> <u>Containing Defect</u> <u>or Noncompliance</u>
See Attachments 1A - 1B		216	58.3 %

The recall population was determined by a review of our Tire Building and Curing Department production records and our internal tire inspection results. The tires being recalled differ from similar items in that they were molded with a different DOT serial week and year (468 - 488) in accordance with 49 CFR 574.5.

3. TOTAL UNITS POTENTIALLY AFFECTED: 216

4. TOTAL ESTIMATED PERCENT CONTAINING DEFECT: 58.3%

COOPER TIRE & RUBBER COMPANY
DEFECT AND NONCOMPLIANCE INFORMATION REPORT
ATTACHMENT 1B

997-004 (16)

DATE: 2/16/99

NHTSA CAMPAIGN NO.

COOPER NO. 106

I. NAME OF MANUFACTURER

A. Fabricating Manufacturer: Cooper Tire & Rubber Company

B. Brand Name or Trademark Owner:

BRAND NAME

OWNER

VIPER RADIAL GT

SEARS ROEBUCK & COMPANY

2. **POTENTIAL NUMBER OF AFFECTED TIRES** (Including a description of the basis for the determination of the recall population and a description of how these items differ from similar items not included in the recall):

<u>Description (including size)</u>	<u>Inclusive Dates (week and year) of Manufacture</u>	<u>Number of Potentially Affected Units</u>	<u>Estimated Percent Containing Defect or Noncompliance</u>
P215/70R14 Tubeless Radial Standard Load			
Viper Radial GT	3DHYUDN468 Nov. 15, 1998 thru Nov. 21, 1998	38	24.6%
	3DHYUDN478 Nov. 22, 1998 thru Nov. 28, 1998	30	99.8%

3. **TOTAL UNITS POTENTIALLY AFFECTED:** 68

4. **TOTAL ESTIMATED PERCENT CONTAINING DEFECT:** 62.4%

SUGGESTED DEALER LETTER

987-004 (15)

Dear Dealer:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Sears, Roebuck and Co. has determined that a defect which relates to motor vehicle safety exists in some tires identified as follows:

F215/70R14 Viper Radial G/T

68 Tires

Identification numbers: 3DHYUDW468
3DHYUDW478

Our company's surveillance indicates that the tires described above may not have adequate rubber coverage of the belt edge due to low tread gauge under the shoulder slots. Such a condition could result in a separation. If the separation is not detected, continued use may cause the ply cords to break and the tubeless liner to tear and lose the inflating air. Loss of air might result in loss of control with vehicle crash the potential occurrence.

Cooper Tire & Rubber Company and we are voluntarily recalling all of the tires with the identification numbers listed. Effective immediately, you or your dealers must not sell any of the tires listed and described above.

You should also comply with the following instructions regarding the return of new and used tires at no charge in accordance with such provisions.

PROCEDURE FOR RETURN AND CREDIT OF RECALLED TIRES

NEW TIRES:

All recalled new tires existing in your inventory, or in your sub-dealers' inventories, should be returned immediately in one shipment, freight collect, to: (address). To assure proper handling, these tires should be listed on the attached Returned Goods Form and the form must accompany this shipment in the packing slip envelope provided. This envelope must be listed on the bill of lading as: "1 envelope - related shipping documents."

Upon verification by Cooper that the tires returned are within the recall group, we will issue credit to you based upon your invoice price of the tires.

USED TIRES:

Sears, Roebuck and Co. registration records are being searched and consumers who have purchased tires with the subject identification number(s) are being notified of the RECALL. Attached for your information is a copy of the notification being sent to such consumers. Tires removed from consumer vehicles as a result of this RECALL should be replaced with tires of like size and construction bearing identification numbers other than those listed above.

We have advised the consumer to return his recalled tire(s) and his letter to you. If your inspection verifies that the consumer has a tire(s) with

the suspect identification number, the tire(s) should be replaced, mounted and balanced at no charge, if presented for remedy within sixty (60) days after (i) receipt of this letter or (ii) notice that a replacement tire(s) is available (if not available at the time of the inspection). It is expected that replacement tire(s) will be available at the time of inspection, however, if the tires are not available at the time of inspection, they will be available within twenty-one (21) days. After expiration of the sixty (60) days, tires will be replaced under our normal adjustment policy.

We have advised the consumer that it will take approximately thirty (30) minutes each to replace the recalled tires. For any tires removed from consumer vehicles during such sixty (60) day period, Sears, Roebuck and Co. will authorize an allowance of \$6.00 per tire to cover mounting and balancing.

Tires removed from consumer vehicles must be listed on our standard Tire and Tube Claim Form. The Claim Form must be properly completed and signed by the consumer. This claim form must accompany the shipment according to standard adjustment procedures.

For the purpose of the RECALL, the Claim Form must include RECALL tires only. The word "RECALL" must be printed directly below the name and address on the claim form. All tires should be identified in crayon with the Claim Form reference number per standard adjustment procedures.

Upon verification by Sears, Roebuck and Co., credit will be issued to you on a no charge replacement basis if replaced by you and returned to: (address) on or before ninety (90) days after notice of this RECALL.

You should return in one shipment all recalled used tires to the inspection point as indicated on the attached map. These tires should be classified as SCRAP and shipped as SCRAP RUBBER TIRES, freight collect. Freight collect privileges apply only within the prescribed time period. Any tires returned after the designated time will be handled under our regular adjustment procedures.

Sears, Roebuck and Co. requests that you advise it of those customers of yours, if any, who have purchased any of the tires described above for which registration forms have not previously been submitted so that such customers can be advised of the recall and the replacement of their recalled tires can be scheduled.

If you have any questions pertaining to the implementation of this RECALL or need assistance, please contact Sears, Roebuck and Co. Consumer Relations Department (telephone number).

Sincerely,

Attachments

SD1060299

Dear Customer:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Sears, Roebuck and Co. has determined that a defect which relates to motor vehicle safety exists in some tires identified as follows:

P215/70R14 Viper Radial G/T

Identification numbers: 3DRYUDM468
3DRYUDM478

Our company's surveillance indicates that the tires described above may not have adequate rubber coverage of the belt edge due to low tread gauge under the shoulder slots. Such a condition could result in a separation. If the separation is not detected, continued use may cause the ply cords to break and the tubeless liner to tear and lose the inflating air. Loss of air might result in loss of control with vehicle crash the potential occurrence.

Sears, Roebuck and Co. is voluntarily recalling all of the tires with the identification numbers above. To insure your safety and satisfaction with our product, we request that you return the recalled tires and this letter to your dealer. If the inspection verifies that you have a tire or tires with the suspect identification number, they will be replaced, mounted and balanced at no charge to you if you have presented them for remedy within sixty (60) days after (i) receipt of this letter or (ii) notice that a replacement tire is available (if not available at the time of inspection). It is expected that replacement tires will be available at the time of inspection, however, if the tires are not available at the time of inspection, they will be available within twenty-one (21) days. After expiration of the sixty (60) day period, tires will be replaced under our normal adjustment policy.

The time required to determine if the tire is subject to RECALL is only a few minutes and approximately thirty (30) minutes per tire if replacement is required.

Should any questions or problems arise while your tires are being inspected or replaced, please call collect to Consumer Relations at (telephone number). We will attempt to be of service to you. In the event you believe we have failed to or are unable to replace your tire(s) without charge to you, within the

SC1060299

sixty (60) day period described above, you may so notify the Secretary of Transportation at the following address: Administrator, National Highway Traffic Safety Administration, Washington, DC 20590, or phone NHTSA "Hot Line" 800-424-9393 or (202)366-0123 in the Washington, DC area.

We regret this inconvenience, but are sure that you understand our interest in your safety and satisfaction with your tires. Please see your dealer immediately for free replacement of the recalled tires. Give this letter to them so that it can be returned to us for purposes of this recall.

Sincerely,

TO BE COMPLETED BY DEALER

Tires inspected and replaced _____
(date)

Dealer stamp or name and address

Dealer: Please complete the above, attach letter to the tire and tube claim form and return with the recalled tires.

SC1060299



99T-004 (2)

THE COOPER TIRE COMPANY

A DIVISION OF COOPER TIRE & RUBBER COMPANY

701 LIMA AVENUE
FINDLAY, OHIO 45840-2316
TELEPHONE: (419) 423-1321

March 8, 1999

Dear Dealer:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Cooper Tire & Rubber Company has determined that a defect which relates to motor vehicle safety exists in some tires identified as follows:

P215/70R14 Cobra Radial G/T70 Tires

Identification numbers: 3DHYC28468
3DHYC28478
3DHYC28488

Our company's surveillance indicates that the tires described above may not have adequate rubber coverage of the belt edge due to low tread gauge under the shoulder slots. Such a condition could result in a separation. If the separation is not detected, continued use may cause the ply cords to break and the tubeless liner to tear and lose the inflating air. Loss of air might result in loss of control with vehicle crash the potential occurrence.

Cooper Tire & Rubber Company is voluntarily recalling all of the tires with the identification number listed. Effective immediately, you or your dealers must not sell any of the tires listed and described above.

You should also comply with the following instructions regarding the return of new and used tires at no charge in accordance with such provisions.

PROCEDURE FOR RETURN AND CREDIT OF RECALLED TIRES**NEW TIRES:**

Check your in-stock inventory immediately for tires in the above size and type for the specified DOT number.

All recalled new tires existing in your inventory or in your subdealers' inventories must be secured and held in one central location. Do not sell them.

Upon verification by Cooper that the tires returned are within the recall group, we will issue credit to you based upon your invoice price for the tires plus duty and taxes.

PMCD1060299

USED TIRES:

Attached for your information is a copy of a SAMPLE NOTIFICATION LETTER you may use to notify customers. Tires removed from consumer vehicles as a result of this RECALL should be replaced with tires of like size and construction bearing identification numbers other than those listed above.

The SAMPLE NOTIFICATION LETTER advises the consumer to return his recalled tire(s) and his letter to you. If your inspection verifies that the consumer has a tire(s) with the subject identification numbers, the tire(s) should be replaced, mounted and balanced at no charge, if presented for remedy within sixty (60) days after (i) receipt of this letter or (ii) notice that a replacement tire(s) is available (if not available at the time of the inspection). It is expected that replacement tire(s) will be available at the time of inspection, however, if the tires are not available at the time of inspection, they will be available within thirty (30) days. After expiration of the sixty (60) days, tires should be replaced under your normal adjustment policy.

The SAMPLE NOTIFICATION LETTER also advises the consumer that it will take approximately thirty (30) minutes each to replace the RECALLED tires. For any tires removed from consumer vehicles during such sixty (60) day period, Cooper Tire will authorize an allowance of \$6.00 U. S. per tire to cover mounting and balancing.

Upon verification by Cooper, credit will be issued to you on a no charge replacement basis on or before ninety (90) days after notice of this RECALL.

After completing inspection of your inventory, your subdealer's inventories, and replacement of consumers recalled tires, please provide Cooper with the following information by fax or telex as soon as possible.

1. Date of inspection.
2. The number of new tires you have located that is subject to this recall, broken down by commodity code and quantity.
3. The number of used tires you have located that is subject to this recall, broken down by commodity code and quantity.

When the above requested information is received by us, we will contact you and advise how to dispose of the tires thus collected.

If you have any questions pertaining to the implementation of this RECALL or need assistance, please contact Cooper Tire & Rubber Company, Consumer Relations Department (800)854-6288.

Sincerely,



James H. Pruett, Operations Manager
Consumer Relations

JMP:jec

Attachments

PRCD1060299



997-1104 (29)

THE COOPER TIRE COMPANY
A DIVISION OF COOPER TIRE & RUBBER COMPANY701 LIMA AVENUE
FINDLAY, OHIO 45840-2316
TELEPHONE: (419) 423-1321

XX de marzo de 1999

Estimado Sr. Distribuidor:

Nos permitimos enviarle este aviso de conformidad con las estipulaciones de la Ley Nacional de Seguridad de Tráfico y Vehículos Automotores.

Cooper Tire & Rubber Company ha determinado que existe un defecto relacionado con la seguridad de los vehículos automotores, en algunos neumáticos con los siguientes números de identificación:

P215/70R14 Cobra Radial G/TNeumáticos 70

Números de identificación: 3DHYC28468
3DHYC28478
3DHYC28488

El estudio realizado por nuestra compañía indica que algunos de los neumáticos señalados arriba posiblemente no cuenten con recubrimiento adecuado de goma en el borde de la banda de rodamiento, debido al reducido espesor de la misma en las ranuras de los resaltes. Tal condición podría producir una separación. Si no se detecta la misma, el uso prolongado del neumático puede originar la rotura de las cuerdas y el desgarramiento del forro del neumático sin cámara, con la consiguiente fuga de aire. A su vez, la fuga de aire puede causar la pérdida de control del vehículo y una posible colisión.

Cooper Tire & Rubber Company ha decidido retirar voluntariamente todos los neumáticos con la numeración indicada arriba. De inmediato, usted y sus subdistribuidores deben suspender la venta de los neumáticos enumerados y descritos más arriba.

También debe seguir las instrucciones siguientes en relación con la devolución de todos los neumáticos, nuevos y usados, sin ningún cargo a su negocio, según tales estipulaciones.

PRSCD1060299

PROCEDIMIENTO PARA LA DEVOLUCIÓN DE NEUMÁTICOS OBJETO DEL RETIRO Y CÁLCULO DEL ABONO CORRESPONDIENTE

NEUMÁTICOS NUEVOS:

Todos los neumáticos nuevos objeto del retiro que existan en su inventario, o en los inventarios de sus subdistribuidores, deben devolverse de inmediato en un solo embarque, flete a cobrar, al punto de inspección indicado en el mapa adjunto. Con el fin de garantizarse el manejo adecuado de los neumáticos, deben estar enumerados en el Formulario de Devolución de Artículos, y el formulario mismo debe acompañar el envío, en el sobre de empaque suministrado. El sobre debe indicarse en el conocimiento de embarque, en la siguiente forma: "1 envelope - related shipping documents/1 sobre - documentos de embarque relacionado."

Sujeto a la verificación por parte de Cooper de que los neumáticos devueltos realmente están dentro del grupo objeto del retiro, efectuaremos el abono correspondiente, con base en el precio facturado de los neumáticos.

NEUMÁTICOS USADOS:

Estamos revisando los archivos de registro de Cooper Tire con el fin de notificar del RETIRO a aquellos consumidores que hayan adquirido neumáticos con los números de identificación indicados arriba. Para su información, adjuntamos el documento de notificación que estamos enviando a los consumidores. Los neumáticos desmontados de los vehículos de los consumidores como resultado de este RETIRO deben reemplazarse con neumáticos del tamaño correspondiente, pero de fabricación con números de identificación diferentes a los enumerados arriba.

Les hemos indicado a los consumidores devolverle a usted, tanto los neumáticos objeto del retiro, como esta carta. Si mediante la inspección correspondiente se verifica que los neumáticos del consumidor tienen los números de identificación que están siendo retirados, deben reemplazarse, montarse y balancearse sin cargo al consumidor, si éste se presenta para la acción correctiva correspondiente dentro de los primeros sesenta (60) días a partir (i) de la recepción de esta carta, o (ii) de la notificación de la existencia de los neumáticos para el reemplazo (si no estaban en las existencias al momento de la inspección). Esperamos que los neumáticos de reemplazo estén en existencia al momento de la inspección, no obstante, de lo contrario, estarán disponibles en un plazo máximo de veintiún (21) días. A partir del vencimiento del plazo de sesenta (60) días, los neumáticos se reemplazan de conformidad con nuestra política normal de ajuste.

Hemos indicado a los consumidores que se toma aproximadamente treinta (30) minutos reemplazar los neumáticos objeto del retiro. Por cada neumático desmontado de los vehículos de los consumidores durante el antedicho período de sesenta (60) días, Cooper Tire autoriza un desembolso de \$6.00 para cubrir los costos de montaje y balanceo.

Los neumáticos desmontados de los vehículos de los consumidores deben aparecer enumerados en nuestro Formulario de Reclamo sobre Neumáticos y Cámaras. El consumidor debe llenar y firmar correctamente el formulario de reclamo. El reclamo debe acompañar el embarque según los procedimientos normales de ajuste.

Para los propósitos del RETIRO, el formulario de reclamo únicamente puede incluir los neumáticos motivo del RETIRO. La palabra "RECALL/RETIRO" debe aparecer directamente arriba del nombre y dirección, en el formulario de reclamo. Todos los neumáticos deben identificarse con tiza de color (crayola) con el número de referencia del formulario de reclamo, de conformidad con los procedimientos normales de ajuste.

Posteriormente a la verificación por parte de Cooper Tire, se le otorgará el abono correspondiente, si usted efectuó el reemplazo sin cargo al consumidor, y se le enviará a: (address/dirección) dentro de un plazo de noventa (90) días a partir del aviso del RETIRO.

Usted deberá enviar en un solo embarque todos los neumáticos objeto del retiro que estén usados al punto de inspección indicado en el mapa adjunto. Estos neumáticos deben clasificarse como SCRAP/DESECHO, y enviarse en calidad de SCRAP RUBBER TIRES/NEUMÁTICOS DE GOMA DE DESECHO, flete a cobrar. El derecho al embarque con flete a cobrar está vigente únicamente dentro del periodo prescrito. Los neumáticos devueltos posteriormente al periodo designado se manejarán de conformidad con los pro

cedimientos normales de ajuste.

Cooper Tire le pide informar de lo anterior a sus clientes que hayan adquirido cualquiera de los neumáticos descritos arriba, y por los cuales no han presentado previamente formularios de registro, de manera que puedan recibir la información relativa al retiro y sea posible programar el reemplazo de los neumáticos objeto del retiro que hayan adquirido.

Si tiene alguna pregunta en relación con la ejecución de este RETIRO, o necesita asistencia, sírvase comunicarse con el Departamento de Atención al Consumidor, Cooper Tire.

Atentamente,



James M. Pruett, Gerente de Operaciones

Departamento de Atención al Consumidor

JMP: jec

Anexos

PRSCD1060299



947-004 (21)

THE COOPER TIRE COMPANY

A DIVISION OF COOPER TIRE & RUBBER COMPANY

701 LIMA AVENUE
FINDLAY, OHIO 45840-2316
TELEPHONE: (419) 423-1321

Dear Customer:

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

Cooper Tire & Rubber Company has determined that a defect which relates to motor vehicle safety exists in some tires identified as follows:

P215/70R14 Cobra Radial G/T

Identification numbers: 3DHYC28468
3DHYC28478
3DHYC28488

Our company's surveillance indicates that the tires described above may not have adequate rubber coverage of the belt edge due to low tread gauge under the shoulder slots. Such a condition could result in a separation. If the separation is not detected, continued use may cause the ply cords to break and the tubeless liner to tear and lose the inflating air. Loss of air might result in loss of control with vehicle crash the potential occurrence.

Cooper Tire is voluntarily recalling all of the tires with the identification numbers above. To insure your safety and satisfaction with our product, we request that you return the recalled tires and this letter to your dealer. If the inspection verifies that you have a tire or tires with the suspect identification number, they will be replaced, mounted and balanced at no charge to you if you have presented them for remedy within sixty (60) days after (i) receipt of this letter or (ii) notice that a replacement tire is available (if not available at the time of inspection). It is expected that replacement tires will be available at the time of inspection, however, if the tires are not available at the time of inspection, they will be available within twenty-one (21) days. After expiration of the sixty (60) day period, tires will be replaced under our normal adjustment policy.

The time required to determine if the tire is subject to RECALL is only a few minutes and approximately thirty (30) minutes per tire if replacement is required.

Should any questions or problems arise while your tires are being inspected or replaced, please call Consumer Relations at (800)854-6288. We will attempt to be of service to you. In the event you believe we have failed to or are unable to replace your tire(s) without charge to you, within the

PBCC1060299

AN EQUAL OPPORTUNITY EMPLOYER

sixty (60) day period described above, you may so notify the Secretary of Transportation at the following address: Administrator, National Highway Traffic Safety Administration, Washington, DC 20590, or phone NHTSA "Hot Line" 800-424-9393 or (202)366-0123 in the Washington, DC area.

We regret this inconvenience, but are sure that you understand our interest in your safety and satisfaction with your tires. Please see your dealer immediately for free replacement of the recalled tires. Give this letter to them so that it can be returned to us for purposes of this recall.

Sincerely,



James H. Pruett, Operations Manager
Consumer Relations

JMP:jec

Attachments

TO BE COMPLETED BY DEALER

Tires inspected and replaced _____
(date)

Dealer stamp or name and address

Dealer: Please complete the above, attach letter to the tire and tube claim form and return with the recalled tires.

PECC1060299



THE COOPER TIRE COMPANY

A DIVISION OF COOPER TIRE & RUBBER COMPANY

99T-004 (3L)

701 LIMA AVENUE
FINDLAY, OHIO 45840-2318
TELEPHONE: (419) 423-1321

Estimado Sr. Consumidor:

Nos permitimos enviarle este aviso de conformidad con las estipulaciones de la Ley Nacional de Seguridad de Tráfico y Vehículos Automotores.

Cooper Tire & Rubber Company ha determinado que existe un defecto relacionado con la seguridad de los vehículos automotores, en algunos neumáticos con los siguientes números de identificación:

P215/70R14 Cobra Radial G/T

Números de identificación: 3DHYC28468

3DHYC28478

3DHYC28488

El estudio realizado por nuestra compañía indica que algunos de los neumáticos señalados arriba posiblemente no cuenten con recubrimiento adecuado de goma en el borde de la banda de rodamiento, debido al reducido espesor de la misma en las ranuras de los resaltes. Tal condición podría producir una separación. Si no se detecta la misma, el uso prolongado del neumático puede originar la rotura de las cuerdas y el desgarramiento del forro del neumático sin cámara, con la consiguiente fuga de aire. A su vez, la fuga de aire puede causar la pérdida de control del vehículo y una posible colisión.

Cooper Tire & Rubber Company ha decidido retirar voluntariamente todos los neumáticos con la numeración indicada arriba. Con el fin de garantizar su seguridad y satisfacción con nuestro producto, le rogamos devolver los neumáticos objeto del retiro, así como esta carta, al distribuidor donde los adquirió. Si mediante la inspección se verifica que su(s) neumático(s) tienen uno de los números de identificación señalados, se reemplazarán, montarán y balancearán sin cargo a usted, si los presenta para la acción correctiva correspondiente dentro de los primeros sesenta (60) días a partir (i) de la recepción de esta carta, o (ii) de la notificación de la existencia de los neumáticos para el reemplazo (si no estaban en las existencias al momento de la inspección). Esperamos que los neumáticos de reemplazo estén en existencia al momento de la inspección, no obstante, de lo contrario, estarán disponibles en un plazo máximo de veintidós (22) días. A partir del vencimiento del plazo de sesenta (60) días, los neumáticos se reemplazan de conformidad con nuestra política normal de ajuste.

El tiempo necesario para determinar si los neumáticos están sujetos al RETIRO es de unos cuantos minutos, y de treinta (30) minutos aproximadamente si se requiere reemplazarlos.

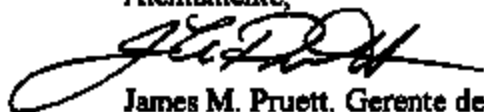
Si tiene preguntas o surgiera algún problema mientras se inspeccionan o reemplazan los neumáticos de su vehículo, sírvase comunicarse al Departamento de Atención al Consumidor, al

PRSCC1060299

(800) 854-6288. Haremos todo lo posible por complacerle. Si usted cree que no pudimos reemplazar los neumáticos de su vehículo sujetos al retiro sin cargo a usted, o no lo hicimos, dentro de un periodo de sesenta (60) días descrito arriba, cuenta con el derecho a notificarlo al Ministerio de Transporte, en la siguiente dirección: Administrator, National Highway Traffic Safety Administration, Washington, DC 20590, o llame al número telefónico de servicio de NHTSA, 800-424-9393, o al (202) 366-0123, en la zona de Washington, DC.

Lamentamos causarle esta molestia, pero estamos seguros de que usted comprende nuestro interés por proteger su seguridad y garantizar su satisfacción con nuestros neumáticos. Le suplicamos dirigirse de inmediato al distribuidor donde los adquirió para recibir el reemplazo correspondiente de los neumáticos sujetos al retiro. Por favor entregue esta carta al distribuidor, de manera que a su vez éste nos la envíe, para los propósitos de este retiro.

Atentamente,



James M. Pruett, Gerente de Operaciones

Departamento de Atención al Consumidor

JMP: jec

EL DISTRIBUIDOR DEBE LLENAR ESTE FORMULARIO

Los neumáticos fueron inspeccionados y reemplazados
el: _____ (fecha)

Sello o nombre y dirección del distribuidor

Al distribuidor: Sírvase llenar este pequeño formulario, adjunte la carta al formulario de reclamo de neumáticos y cámaras, y por último devuélvalos junto con los neumáticos objeto del retiro.

PRCCS1060299

EXHIBIT IV

94T-1114 (J)

MAKE TWO COPIES. (Send one with tires per instructions and retain second copy for your records.)

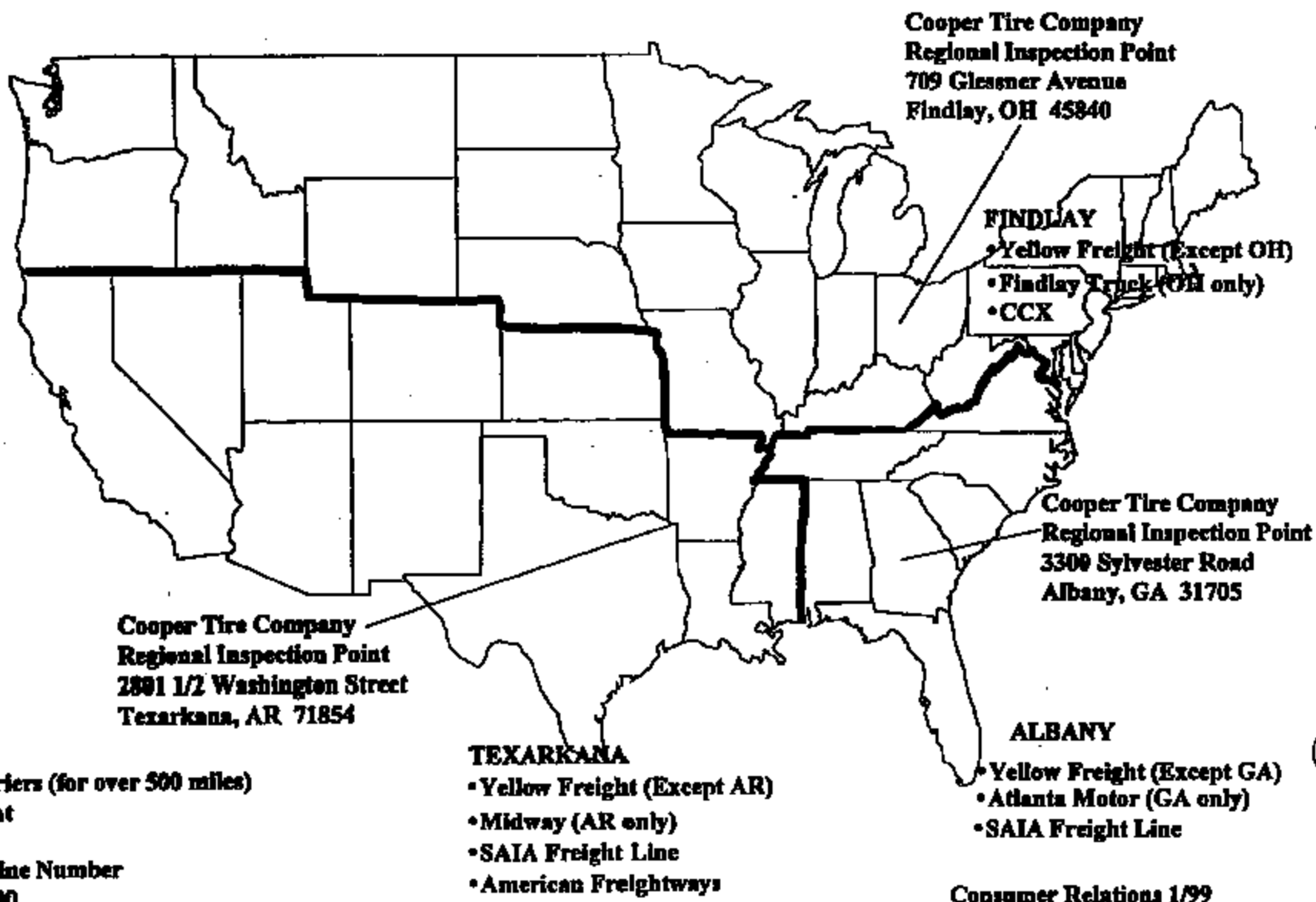
Returned From:
(Dealer Name and Address)

Date Shipped _____

Dealer Signature _____

[illegible]

COOPER TIRE COMPANY
Regional Inspection Points and
Required Carriers for Adjustment Tires & Tubes



COOPER TIRE & RUBBER COMPANY

IMPORTANT! PACKING SLIP ENCLOSED



BILL OF LADING NO. _____

TRAILER NUMBER _____

997-004 (34)



COOPER TIRE & RUBBER COMPANY
FINDLAY, OHIO 44840

99T-104 (3)

SAFETY RECALL NOTICE